

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING )  
(UPS PROPOSALS ONE, TWO AND THREE) ) Docket No. RM2016-2

**UNOPPOSED MOTION OF  
AMAZON FULFILLMENT SERVICES, INC.,  
FOR ACCESS BY T. SCOTT THOMPSON  
TO MATERIALS FILED UNDER SEAL  
BY UNITED PARCEL SERVICE, INC.  
AND UNITED STATES POSTAL SERVICE**

(November 9, 2015)

Pursuant to 39 C.F.R. § 3007.40, Amazon Fulfillment Services, Inc. (“Amazon” or “AFSI”), respectfully requests the Commission allow an additional reviewing representative, T. Scott Thompson, to gain access to (1) UPS library reference UPS-RM2016-2/LR-NP1 (filed by UPS under seal in this docket on October 8, 2015), and (2) the non-public data filed in Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*.

In Order No. 2765, the Commission granted Amazon’s unopposed motion to make the same material available to three consultants affiliated with SLS Consulting, Inc., and two lawyers affiliated with Venable LLP. Since then, Amazon has retained Dr. Thompson, a partner in the economic consulting firm of Bates White, as an additional consultant in this matter. Dr. Thompson’s biography is available at [www.bateswhite.com/professionals-Scott-Thompson.html](http://www.bateswhite.com/professionals-Scott-Thompson.html). Dr.

Thompson's certificate of compliance with the Commission's protective conditions is attached to this motion.

The Postal Service and UPS have authorized Amazon to state that they do not oppose this request.

Respectfully submitted,

/s/

David M. Levy  
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*Counsel for Amazon Fulfillment Services, Inc.*

November 9, 2015

## CERTIFICATION

The undersigned represents that:

Access to the materials provided by the United States Postal Service and United Parcel Service in the matters identified as PRC Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*, and PRC Docket No. RM2016-2, *Periodic Reporting (UPS Proposals One, Two and Three)*, has been authorized by the Commission. The cover or label of the copies obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as PRC Docket No. RM2016-2. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name: T. Scott Thompson, Ph.D.

Firm: Bates White, LLC

Title: Partner

Representing: Amazon Fulfillment Services, Inc.

Signature: T. Scott Thompson

Date: November 5, 2015